

EXHIBIT D



Harter Secrest & Emery LLP
ATTORNEYS AND COUNSELORS

www.hsllp.com

November 2, 2016

**VIA E-MAIL (Danielle.rios@usdoj.gov)
and Facsimile (213) 894-2030**

U.S. MARSHALS SERVICE – CENTRAL DISTRICT OF CALIFORNIA
Attn: Civil Process / Danielle Rios
350 W. 1st Street, Suite 3001
Los Angeles, CA 90012

Re: *Global BTG LLC v. National Air Cargo, Inc.*
· Case No. 2:11-cv-01657 1-14-12414 / U.S. District Court Central District of CA
· Our File No. 099788.000002

Dear Ms. Rios:

This letter is to follow up on my recent call with your office regarding a Notice of Levy in the above-referenced matter. As noted, we serve as bankruptcy counsel to the defendant, National Air Cargo, Inc. (“NAC”), who filed for Chapter 11 bankruptcy on October 17, 2014 (“Petition Date”). The case was filed with the U.S. Bankruptcy Court for the Western District of New York and assigned Case No. 1-14-12414-MJK.

The plaintiff, Global BTG LLC (“Global”), was within its rights to issue the pre-bankruptcy Notice of Levy on October 14, 2014. However, the automatic stay under the U.S. Bankruptcy Code went into effect on the Petition Date; thus, prohibiting “the enforcement, against the debtor *or against property of the estate*, of a judgment obtained before the commencement of the case under this title” – 11 U.S.C. § 362(a)(2).

The Notice of Levy was executed against one of NAC’s customers, ManTech International Corp. (“ManTech”), based on an outstanding receivable owed to NAC in the amount of \$95,100 – proof of which is attached hereto. The ManTech receivable is an asset of NAC’s bankruptcy estate and as such, U.S. bankruptcy law explicitly prohibits Global from collecting upon it. I have copied Global’s counsel on this letter, so they are aware of the situation.

Per the above, our office must request that the U.S. Marshals Service release the funds currently in its possession via check payable to “National Air Cargo Inc.” and delivered to my attention at the Buffalo office address listed below.

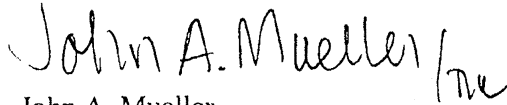
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Page 2 of 2

Please contact me with any questions or concerns; otherwise, your office's cooperation in this matter is greatly appreciated.

Sincerely,

HARTER SECREST & EMERY LLP

A handwritten signature in black ink that reads "John A. Mueller" followed by a stylized flourish or initial.

John A. Mueller

DIRECT DIAL 716 841 3701
E-MAIL JMUELLER@HSELAW.COM

JAM:jam

Attachments/Enclosures

Cc: Donald J. Kula, Esq. (*via e-mail*)
Jeffrey S. Goodfried, Esq. (*via e-mail*)
Eric D. Danat (*via e-mail*)

Customer aging report

Report date 10/3/2016, sorted by Document date

Account	Name	Balance as of		Past Due			
		10/3/2016		0 - 30 Days	31 - 60 Days	61 - 90 Days	91 - 120 Days
AAANT300	Mantech International Co						
Document dt:	Voucher/Invoice	Due Date					
0/27/2014	0092090GJE/930239154-01	12/11/2014	\$5,100.00				
	Total due		95,100.00	0.00	0.00	0.00	0.00
	Percentages		100.00	0.00	0.00	0.00	0.00
	Report total:		95,100.00	0.00	0.00	0.00	0.00
	Percentages		100.00	0.00	0.00	0.00	0.00



National Air Cargo, Inc.
350 Windward Drive
Orchard Park, NY 14127
UNITED STATES

Phone: 716-631-0011
Fax: 877-705-3689 / 716-677-2657

Invoice

Mantech International Co.
2250 Corporate Park Drive
Suite #600
Herdon, VA 20171
UNITED STATES
TAX ID: 721527000

Invoice No.	Invoice Date
930239154-01	October 27, 2014
Customer No.	HAWB/Ref No.
MANT300	930239154



SHIPPER
MANTECH SOCOM - KDH
Kandahar
KANDAHAR
AFGHANISTAN



CONSIGNEE
MANTECH SOCOM
Bagram
Bagram/ManTech SOCOM Retrograde Yard
BAGRAM
AFGHANISTAN

SHIP DATE: August 06, 2014		TERMS: Due on Receipt		Cust Ref #:	
PIECES: 20	DECLARED VALUE: NIL	ACTUAL WGT: 165,347 LB	75,000 KG	CHARGEABLE WGT: 532,973 LB	241,753 KG
SERVICE LEVEL: STANDARD			Due Date: October 28, 2014		

DESCRIPTION OF CHARGES	QUANTITY	RATE	AMOUNT
LAND TRANSPORT - 20ea_40ft Flatbed	20	\$4,755.00	\$95,100.00

NOTES

PLEASE PAY in USD **\$95,100.00**

PLEASE REMIT TO:

National Air Cargo, Inc.
350 Windward Drive
Orchard Park, NY 14127
UNITED STATES

WIRING INSTRUCTIONS:

Wells Fargo Bank
ABA# 121000248
Acct# 4124524257
Acct Name: National Air Cargo, Inc.
Swift Code: WFBUS6S

As a reminder, our full terms and conditions are located at www.nationalaircargo.com

-Demand

Close ^

LINE BANK PA 008 0115997 ✓
DATE 06/26/15
Pay Amount *****100.00***
2 HAY CIR 97
07708 8006004210

TRB CLEVELAND
> 041036033 <
reas DG - OTCNET
06/25/2015

Printer Friendly Version

Account Number: 8026254718
Account Name: ManTech - AP
Post Date: 06/26/2015
Amount: 395 100.00
Transaction Type: Checks/Debits
Seq/Ref#: 84288921
Check #: 11997

Transmission Report

Date/Time
Local ID 1

11-03-2016
7168531617

10:26:00 a.m.

Transmit Header Text
Local Name 1

Harter Secrest & Emery LLP.

This document : Confirmed
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Document size : 8.5"x11"



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The plaintiff, Global BTG LLC ("Global"), was within its rights to issue the pre-bankruptcy Notice of Levy on October 14, 2014. However, the automatic stay under the U.S. Bankruptcy Code went into effect on the Petition Date, thus, prohibiting "the enforcement, against the debtor or against property of the estate, of a judgment obtained before the commencement of the case under this title" - 11 U.S.C. § 362(a)(2).

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50 FOUNTAIN PLAZA, SUITE 1000, BUFFALO, NY 14202-2403 (PHONE) 716.853.1010 (FAX) 716.853.1517
(FACSIMILE) 213.894.2030
100 FOUNTAIN PLAZA, SUITE 1000, BUFFALO, NY 14202-2403 (PHONE) 716.853.1010 (FAX) 716.853.1517
(FACSIMILE) 213.894.2030

Total Pages Scanned : 5

Total Pages Confirmed : 5

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001	792	213-894-2030	10:24:14 a.m. 11-03-2016	00:01:04	5/5	1	EC	HS	CP24000

Abbreviations:

HS: Host send
HR: Host receive
WS: Waiting send

PL: Polled local
PR: Polled remote
MS: Mailbox save

MP: Mailbox print
RP: Report
FF: Fax Forward

CP: Completed
FA: Fail
TU: Terminated by user

TS: Terminated by system
G3: Group 3
EC: Error Correct